

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF OHIO**

UNITED STATES OF AMERICA

Plaintiff,

v.

RUSSELL MILEY CRUZ

Defendant.

) **CASE NO. 1:19-CR-00109**

)

) **JUDGE BENITA Y. PEARSON**

)

) **MOTION REQUESTING TELEPHONIC
CONFERENCE**

)

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Now comes Defendant, Russell Miley Cruz, by and through undersigned counsel, and hereby respectfully requests this Honorable Court for an Order granting a motion for a telephonic conference. The United States and Counsel are aware of discovery deadlines but would like to discuss those dates with the Court as Defendant will likely be assessed for competency.

The United States and Counsel have availability on the following days if agreeable to the Court's schedule. Those dates include: 8:00am or 10:30am on Tuesday, April 16th, the afternoon of April 18th or the morning of Friday, April 19th.

WHEREFORE, Defendant respectfully moves this Court for an Order granting a motion for telephonic conference.

RESPECTFULLY SUBMITTED,

/s/ **DAVID J. BETRAS**

DAVID J. BETRAS

ATTORNEY FOR DEFENDANT

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of the foregoing document was filed and served electronically this 15th day of April upon attorneys who have completed the ECF registration as required by the Court.

/s/ David J. Betras

DAVID J. BETRAS

ATTORNEY FOR DEFENDANT